

EXHIBIT 67

1 UNITED STATES DISTRICT COURT
2 WESTERN DISTRICT OF MICHIGAN
3 SOUTHERN DIVISION

4 D.L.; K.S.F.; and K.B.,
5 by and through her parent
6 and next friend H.B.,

7 Plaintiffs,
8 vs.

9 MICHIGAN DEPARTMENT OF
10 EDUCATION,

11 Defendant.

/

12 DEPOSITION OF DONQUARION L.D. LEWIS

13 Taken by the Defendant at 251 N. Rose Street,
14 Suite 200, Kalamazoo, Michigan, on Tuesday, March 5,
15 2024, commencing at 10:07 a.m.

16 APPEARANCES:

17 For the Plaintiffs: MS. ERIN H. DIAZ (P80388)
18 MR. MITCHELL D. SICKON (P82407)
19 DISABILITY RIGHTS MICHIGAN
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(Appearances Continued on Page 2.)

<p style="text-align: right;">Page 6</p> <p>1 remind you that Carl is transcribing everything that we 2 are discussing. 3 A. Okay. 4 Q. So it's important that when you respond to my questions 5 you answer clearly. 6 A. Okay. 7 Q. Yes or no or I don't know, something to that effect. 8 But no head nods or uh-huh (affirmative). 9 A. Okay. 10 Q. And moving forward if I hear that I may ask you to just 11 repeat your answer or clarify it. 12 A. Okay. 13 Q. Also, since he is trying to take down our conversation 14 it's important that we not speak over each other. So 15 when you are speaking I will try not to interrupt you 16 and vice-versa. We want a clean transcript. 17 A. Okay. 18 Q. Do you have any questions about the process or any 19 concerns before we get started? 20 A. No. 21 Q. Have you ever gone by any other names besides the name 22 that you gave when you first got on the record? 23 A. D.Q. 24 Q. D.Q. you said? 25 A. Yeah.</p>	<p style="text-align: right;">Page 8</p> <p>1 A. Rent. 2 Q. Who pays the rent there? 3 A. Her. 4 Q. How about the utilities? 5 A. I don't know how it break down, but I know it round up 6 around 780. 7 Q. Who pays that utility bill? 8 A. Her. 9 Q. Who pays for the food for the household? 10 A. Her. 11 Q. Do you pay any of the household bills? 12 A. When I am working. 13 Q. Are you paying any right now? 14 A. Yeah, I pitch in. 15 Q. When you say pitching in, what does that mean? 16 A. Giving her what I can. 17 Q. When is the last time that you were able to give her 18 what you can? 19 A. Last week. 20 Q. How much did you give her? 21 A. Three hundred. 22 Q. And when was the payment that you made before last 23 week? 24 A. No payment. 25 Q. You can't remember?</p>
<p style="text-align: right;">Page 7</p> <p>1 Q. Is that a nickname that you use? 2 A. Yeah. 3 Q. And what's your date of birth, D.Q.? 4 A. August 20th 2002. 5 Q. Where do you currently reside? 6 A. What does that mean? 7 Q. What's your current address? 8 A. 1315 Concord Place Drive. 9 Q. Is that in Kalamazoo? 10 A. Yes. 11 Q. How long have you lived there? 12 A. Around June. 13 Q. Since June of 2023? 14 A. Yeah. 15 Q. Who lives there with you? 16 A. My girlfriend. 17 Q. And what's your girlfriend's name? 18 A. Dashayla (ph). 19 Q. And what's her last name? 20 A. Stanley. 21 Q. Anyone else live in that house? 22 A. No. 23 Q. Who owns that house? 24 A. Her. 25 Q. Does she rent the house or does she own it outright?</p>	<p style="text-align: right;">Page 9</p> <p>1 A. No payment. 2 Q. So last week is the first time you helped with the 3 household bills since June of '23? 4 A. Yeah. 5 Q. And before you moved to this address where did you live 6 before that? 7 A. With my mom. 8 Q. And what's that address? 9 A. 634 Grasshopper, Apartment 321. 10 Q. Do you know how many years you lived there? 11 A. Around seven or eight. 12 Q. Is that seven or eight years? 13 A. Yeah. 14 Q. And who else lived there besides you and your mom? 15 A. My siblings. 16 Q. Your siblings you said? 17 A. Yeah. 18 Q. How many siblings do you have? 19 A. Four. 20 Q. And what are their names? 21 A. Kayana (ph), DeMaya (ph), DeMont (ph) and DeMir (ph). 22 Q. Do you know how old they are? 23 A. Kayana, she just turned 20 last month; DeMaya, she 14; 24 DeMont, he 13; and DeMir, six. 25 Q. And why did you move out from your mom's house in with</p>

<p style="text-align: right;">Page 10</p> <p>1 your girlfriend?</p> <p>2 A. It was a lot. Me getting older and sleeping with my</p> <p>3 siblings, and I didn't really like that too much.</p> <p>4 Q. And when you say it was getting to be a lot, what do</p> <p>5 you mean?</p> <p>6 A. I wasn't working when I was with my mom, so it was like</p> <p>7 I was really just sitting around.</p> <p>8 Q. Did she ask you to leave?</p> <p>9 A. No.</p> <p>10 Q. Does your mom have a partner that lives in the</p> <p>11 household as well?</p> <p>12 A. Yes.</p> <p>13 Q. And who is that?</p> <p>14 A. Her husband. His name DeMont.</p> <p>15 Q. How long has she been married to him?</p> <p>16 A. I want to say about ten years.</p> <p>17 Q. Have you ever had contact with your father?</p> <p>18 A. Yes.</p> <p>19 Q. Does he live in Kalamazoo?</p> <p>20 A. Yes.</p> <p>21 Q. Did you ever live with him growing up?</p> <p>22 A. No. He was in prison since I was like 13, but when he</p> <p>23 got out I went to go stay at his house on the weekend,</p> <p>24 or when I was getting frustrated at my mom's growing</p> <p>25 up. But I never like lived with him after that.</p>	<p style="text-align: right;">Page 12</p> <p>1 A. Yeah.</p> <p>2 Q. From what you can remember?</p> <p>3 A. Yeah.</p> <p>4 Q. I am going to ask you about your reading disability.</p> <p>5 Do you remember when you were diagnosed with that</p> <p>6 disability?</p> <p>7 A. I don't know when I was diagnosed, but I know I had a</p> <p>8 reading disability growing up. When I talked to</p> <p>9 Dr. Owens she really sat down with me and like</p> <p>10 explained what it means and stuff to be diagnosed.</p> <p>11 Q. Do you know how you were diagnosed with a reading</p> <p>12 disability?</p> <p>13 A. No.</p> <p>14 Q. And you just mentioned a doctor's name. Who is that?</p> <p>15 A. Dr. Owens.</p> <p>16 Q. Who is Dr. Owens?</p> <p>17 A. A doctor, I can't recall what type of doctor she was.</p> <p>18 Q. Did she do an evaluation of you?</p> <p>19 A. Yes.</p> <p>20 Q. Do you remember when that was?</p> <p>21 A. Yes.</p> <p>22 Q. When was that?</p> <p>23 A. August 2001.</p> <p>24 Q. Was it August of 2021 or 2001?</p> <p>25 A. 2021. I apologize.</p>
<p style="text-align: right;">Page 11</p> <p>1 Q. Sure. Do you remember how old you were when you went</p> <p>2 to stay with him on the weekends?</p> <p>3 A. Since I was 15 and up.</p> <p>4 Q. Do you have any children?</p> <p>5 A. No.</p> <p>6 Q. Other than this lawsuit have you been involved in any</p> <p>7 other lawsuits?</p> <p>8 A. No.</p> <p>9 Q. And don't tell me about any conversations that you had</p> <p>10 with your attorneys because that's privileged and</p> <p>11 private, but what did you do to prepare for today's</p> <p>12 deposition?</p> <p>13 A. Myself, I got some sleep last night. We went over like</p> <p>14 questions.</p> <p>15 Q. Did you review any paperwork?</p> <p>16 A. No.</p> <p>17 Q. Mr. Lewis, do you have any disabilities?</p> <p>18 A. Yes.</p> <p>19 Q. What are those disabilities?</p> <p>20 A. I can't name them all off the top. I know it's</p> <p>21 reading, reading disability, speech, ADHD,</p> <p>22 post-traumatic stress. I forgot the rest of it.</p> <p>23 Q. So to clarify, your disabilities are a reading</p> <p>24 disability, a speech disability, ADHD, and PTSD; is</p> <p>25 that right?</p>	<p style="text-align: right;">Page 13</p> <p>1 Q. That's okay. Now I want to ask you about your speech</p> <p>2 disability. Do you remember when you were diagnosed</p> <p>3 with that?</p> <p>4 A. No.</p> <p>5 Q. How about ADHD? When you were diagnosed?</p> <p>6 A. Like when you say diagnosed, like what do you mean?</p> <p>7 Q. Did you ever have a doctor or a medical professional or</p> <p>8 someone else who works in mental health tell you that</p> <p>9 you have ADHD?</p> <p>10 A. I believe my doctors at the Family Health Center when</p> <p>11 my mom used to take me. Dr. Jackson, that was my</p> <p>12 doctor since I was a kid. So since I turned 18 she was</p> <p>13 my doctor.</p> <p>14 Q. Do you remember when it was that you learned that you</p> <p>15 ADHD or you were diagnosed with ADHD?</p> <p>16 A. No, ma'am.</p> <p>17 Q. I am sorry, could you repeat that?</p> <p>18 A. No, ma'am.</p> <p>19 Q. How about PTSD? Do you remember when you were</p> <p>20 diagnosed with PTSD?</p> <p>21 A. No, but I remember Dr. Owens telling me I had it over</p> <p>22 our exam.</p> <p>23 Q. And that exam was again, in August of 2021?</p> <p>24 A. Yes, ma'am.</p> <p>25 Q. Do you remember being diagnosed anytime before that</p>